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April 6, 1989

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VIA TELECOPY

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United States Environmental
Protection Agency
Region III
841 Chestnut Street
Philadelphia, PA 19107

Mr. Michael Towle
United States Environmental
Protection Agency
Region III
841 Chestnut Street
Philadelphia, PA 19107

Re: Butler Tunnel Phase II RI/FS

Dear Ms. Shine and Mr. Towle:

In the absence of Mr. A.B.M. Houston, the technical coordinator for the Butler Tunnel PRP Group, I am submitting on behalf of the Butler Tunnel PRP Group, the proposed modifications to the work plan. As we discussed in Philadelphia on the 23rd, this letter presents the changes in concept, changes which are very modest. If EPA agrees with these conceptual changes, we will submit within three weeks of receipt of written notification from you, a final revised work plan embodying these changes in detail for your review and approval. If EPA approves that revised work plan, the PRPs will have 30 days from receipt of that notification of approval in which to opt in or opt out of conducting the Phase II RI/FS.

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The proposed conceptual changes are three:

(1) omit the drilling of borehole 2-A in light of EPA's decision to drill a borehole nearby which would be suitable for sampling and water level recording. In light of the proximity of EPA's proposed borehole to the PRP group's proposed borehole 2-A, the PRP group proposes to omit 2-A as redundant.

(2) the work plan proposed two full rounds of full target compound screening from the Tunnel (one each during relatively high and low discharge rates), and subsequent bi-weekly sampling for oil and the 17 constituents identified in the Consent Order. The work plan further proposed one round of full target compound screening at each borehole and subsequent bi-weekly sampling for oil and the 17 constituents identified in the Consent Order. Pending review of the initial target compound screening results, and other applicable analytical data, the PRP group proposes that the work plan allow for further reductions in the extent of sample analysis and collection frequency during so-called "average" and "dry" weather periods. The PRP group's technical coordinator and EPA's technical coordinator would agree on the appropriate compounds to be analyzed, and sampling frequency. The existing work plan already provides for this procedure. Thus the only change proposed would allow for increased flexibility relative to a determination of compounds to be analyzed, and sampling frequency.

(3) the five adjustments in the work plan requested by EPA's May 16, 1988 letter to Mr. Houston will be incorporated into the revised work plan, as agreed in our prior correspondence, including paragraph one of my March 16, 1989 letter to you.

We view the proposed changes as modest and reasonable under the circumstances. Please let us know formally if these changes are satisfactory to EPA in concept. If so, we will begin working to put these into detail in the revised final work plan for EPA's review.

It is the current intention of counsel representing a majority of the PRPs to recommend participation on the Phase II RI/FS. I am aware of no counsel or client of the Butler Tunnel

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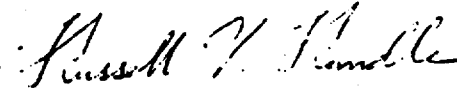
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PRP group who intends to recommend against participation; some have not yet decided on their recommendation.

Sincerely,



Russell V. Randle
for the Butler Tunnel Technical
Committee

RVR/tlc

cc: Butler Tunnel PRP Group
Michael McIntyre, Esq.

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